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December 1, 1998

VIA HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Ex Parte Presentation
ET 95-18; RM 9328

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, I hereby submit an original plus three copies of this letter to notify you that Dave Otten of Celsat America, Inc., and John Quale and I of this firm, met on Monday, November 30, 1998 with Mindy Ginsburg, Howard Griboff, Linda Haller, Karl Kensinger, Chris Murphy, Ron Repasi, and Tom Tycz of the International Bureau. During this meeting, Celsat reiterated its view, which it has previously expressed both in its pleadings and in prior meetings at the Commission, that Celsat is a new entrant in the market for the provision of mobile satellite service ("MSS") and that the Commission should award new entrants spectrum at 2 GHz before awarding any such spectrum to incumbent MSS providers. Celsat also asked the Commission staff members about the timing of the 2 GHz service rules proceeding and the feasibility of adopting certain band plans for 2 GHz. In response to questions from the Commission's staff, Celsat described its proposed use of spectrum in the Ka-band for feeder links for its 2 GHz MSS system and reiterated its view that the Commission need not wait for Celsat to obtain feeder link spectrum to grant Celsat's 2 GHz MSS license but should award the two licenses independently. Finally, Celsat requested clarification with respect to the Commission's view on whether 2 GHz MSS providers that do not cause interference with BAS users in the 2 GHz band must pay for relocation of the BAS users.

In addition to the aforementioned meeting with the International Bureau staff, Dave Otten and I met with Dan Connors of Commissioner Ness's office, Ari Fitzgerald of Chairman Kennard's office, Karen Gulick of Commissioner Tristani's office, Paul Misener of Commissioner Furchtgott-Roth's office, and Peter Tenhula of Commissioner Powell's office. In each of these meetings, Mr. Otten made a brief presentation about his professional background, Celsat's proposed 2 GHz MSS system, and Celsat's desire to obtain a Commission license as expeditiously as possible. In addition, Celsat gave copies of the attached "Mobile Satellite Communications System Briefing" to certain of these individuals and responded to their questions related to the Briefing and to Celsat's proposed 2 GHz MSS system. Finally, Celsat asked certain of these individuals their views on the Petition for Expedited Rulemaking filed by ICO Services Limited.

Please direct any questions concerning this matter to the undersigned.

Very truly yours,

Toni Cook Bush

cc: Dan Connors
Ari Fitzgerald
Mindy Ginsburg
Howard Griboff
Karen Gulick
Linda Haller
Karl Kensinger
Paul Misener
Chris Murphy
Ron Repasi
Peter Tenhula
Tom Tycz

Mobile Satellite Communications System

BRIEFING

November, 1998

David D. Otten
Chairman and CEO
Celsat America, Inc.

The Celsat System

Satellite Coverage for Small Mobile Phones

- United States
- Canada
- Mexico

Very Low Price

- 8 cents per minute including long distance
- $9.95 per month for high speed (384 kbps) internet access

PCS size handheld

Celsat America, Inc. History

1991 - 1993

- **Developed Technical and Business Concepts**
- **Initiated FCC Dialog**
- **First U.S. Patent Granted**
- **Investment by Titan Corp.**

1994 - 1996

- **Additional U.S. Patents Granted**
- **Investment by Cellular Communications, Inc.**
- **Ericsson, Nortel, Cellular Communications, Inc., and Hughes Support**

1997 - Present

- **Investments by Echostar DBS Corp., George Schmitt, and Bill Ginsberg**
- **Sale of Seven Billion Minutes of Air Time to GSM Alliance (LOI)**
- **Selected Merrill Lynch and DLJ as Lead Investment Bankers**
- **Unique application for a Nationwide FCC License**
- **Additional U.S. and Foreign Patents Granted**

The GSM Alliance Companies Will Be Celsat's Customers

COMPANY	NUMBER OF POPS	CONTACT
Omnipoint Communications LLC	97 million	George Schmitt President
Western Wireless Corporation	52 million	John Stanton Chairman
Pacific Bell Mobile Services	31 million	Roy Gunter Vice President
Aerial Communications, Inc.	28 million	Don Warkentin President and CEO
Microcell Telecommunications, Inc.	25 million	Andre Tremblay President
Powertel, Inc.	24 million	Allen Smith President & CEO
BellSouth Mobility DCS	13 million	Eric Ensor President

System Fundamentals

Company	Satellites Needed Initially	Initial System Cost	Coverage	Maximum U.S. Circuits	Signal Margin
Iridium	66 Plus Spares	$5.0 Billion to $8 Billion	World Wide	4,000	16db Maximum
ICO	12	$4.6 Billion	World Wide	4,000	8 - 10db
Globalstar	48 Plus Spares	$3.3 Billion Plus Ground Stations	World Wide	4,000	8db Maximum
Celsat	1 Plus Spare	$0.75 Billion	U.S., Canada, and Mexico	50,000 Per Satellite	16 - 22db

Celsat Is The Most Competitive

	Price Per Minute	Handset Price	Monthly Access Charge	Voice Quality	Dual Mode Phone Size	Average RF Power	Satellite Handovers Required During a Call	Wipe Out From Microwave Ovens?
Iridium	$3.00 to $7.00 retail	$3,000 to $4,000	$70	In Between	Brick With Hot Dog Antenna	0.5 Watt	Many	No
ICO	$2.00 retail	$1,000	Yes	Marginal	Brick With Hot Dog Antenna	0.5 Watt	Some	No
Globalstar	$1.50 retail	$2,000	Yes	Marginal	Brick With Hot Dog Antenna	0.5 Watt	Many	Yes
Celsat	$0.08 wholesale	$200	None	Good	Same As PCS Phone	0.25 Watt	None	No

Speed of Light Transmission Effect

No Impact on:

- Internet Usage
- Fax
- Paging
- Data

Echo Suppression Minimizes any Problems for Voice

High Gain, Multi-Beam Satellite Antenna

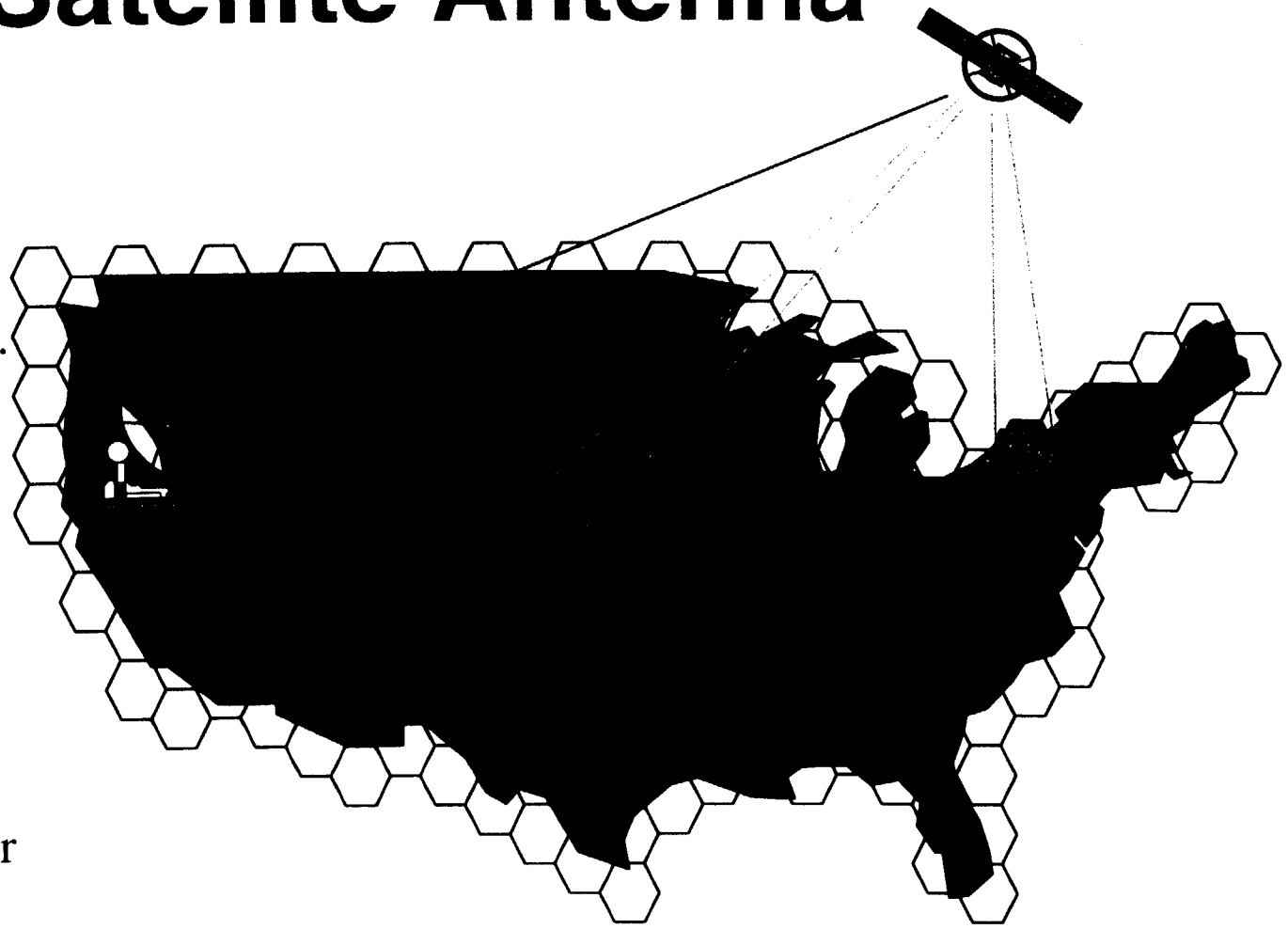
120 Transponders Per Satellite.

20 Meter Satellite Antenna Diameter.

$^1/_2$ Degree 3dB Beamwidth, ~50dB Gain.

100 Miles Cell Radius on Earth.

Beams Always at Least 36 Degrees Above Horizon for the US, except Alaska.

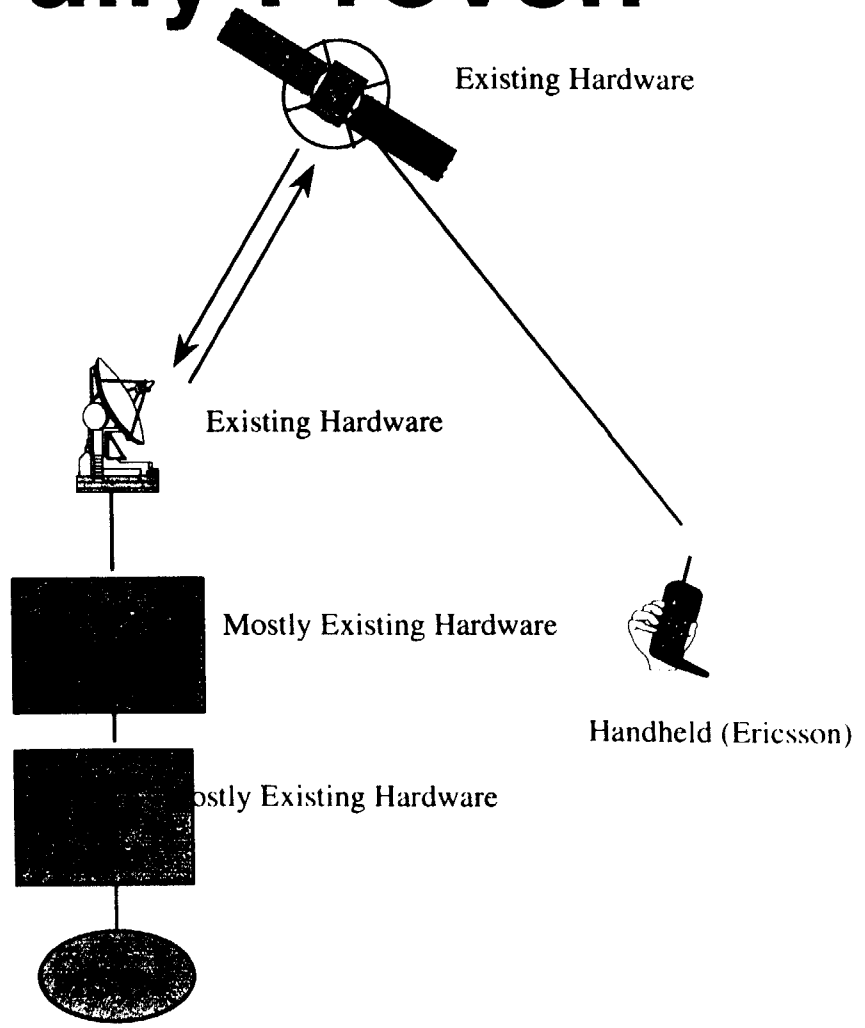


Technology Fully Proven

Satellite Bus, Payload and 21m S-Band Multi-Beam Antenna Are Proven In-Use Designs.

Ground Gateway Network & Base Station Utilize Mostly Existing Feeder Station and Cellular/PCS Hardware.

Dual Mode Terminal - Advanced State of Development



Celsat's Patent Summary

Dual Mode Satellite and Ground Mobile Communications System

- **U.S. Patents 5,073,900, 5,339,330, & 5,832,379; European Patent EP 0 476 127 B1; German Patent DE 691 28016 ; French Patent 0476127; Canadian Patent 2,953,851; Chinese Patent 91110698.7; Russian Patent 2100904**

Power Control

- **U.S. Patent 5,446,756**
- **Second U.S. Patent Allowed**

Coexistence with Incumbent Fixed Services

- **U.S. Patent 5,511,233**

Position Determination

- **U.S. Patent 5,612,703**

Fraud Prevention

- **U.S. Patent 5,835,857**

Additional Patents Allowed and Pending

SUMMARY OF CELSAT'S ADVANTAGES

Lowest cost provider by a wide margin

- 8 cents per minute for a mobile phone call including long distance

Provides the best service

- Smallest consumer phone handset
- Best voice quality
- Safest radiated power of any of the competition
- Multiple services: Voice, Paging, Internet
- Automatically determines the position of the user for safety and security
- Full U.S. coverage and most of the population of Canada and Mexico

2 GHz Band Plan - MSS Allocations